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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Ms. J.P., et al.,

Plaintiffs,

v.

Merrick B. Garland,
U.S. Attorney General, et al.,

Defendants.

Case No. 2:18-cv-6081-JAK-SK

**DECLARATION OF TALIA
INLENDER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: March 25, 2024
Time: 8:30 a.m.
Ctrm: 10B
Location: First Street Courthouse
350 W. First Street
Los Angeles, CA 90012
Judge: Hon. John A. Kronstadt

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18 ** Institution listed for identification
purposes only

1 I, Talia Inlender, declare as follows:

2 1. I execute this declaration based upon my personal knowledge. If called as
3 a witness in this proceeding, I could and would competently testify with respect to the
4 facts set forth herein. I execute this declaration in support of plaintiffs' motion for an
5 award of attorney's fees under the Equal Access to Justice Act ("EAJA") calculated at
6 prevailing market rates. I believe that counsel with specialized expertise unavailable at
7 the inflation-adjusted EAJA rate was essential to the plaintiffs' successful prosecution
8 in *Ms. J.P. et al. v. Garland, et al.*

9 2. I serve as the Deputy Director of the Center for Immigration Law and
10 Policy ("CILP"), at UCLA School of Law, which is a hub for immigration legal
11 scholarship and advocacy. In my role on the inaugural senior leadership team, I help
12 develop CILP's strategic vision for advocacy and litigation and play a key role in
13 overseeing research, advocacy, and litigation related to immigrants' rights. I also teach
14 the Immigrants' Rights Policy Clinic.

15 3. Prior to my role as Deputy Director at CILP, I served as a Supervising
16 Senior Staff Attorney in Public Counsel's Immigrants' Rights Project which provides
17 legal services for low-income immigrants. Public Counsel is a non-profit, public
18 interest law office dedicated to recruiting California lawyers to represent indigent
19 clients *pro bono* and is the largest public interest law firm in the country. Attached
20 hereto as Exhibit A, is a copy of my curriculum vitae.

21 4. I have successfully litigated a number of immigrants' civil rights cases
22 over the course of my career. *See e.g., Franco-Gonzalez v. Holder*, No. 10-2211
23 (C.D. Cal. Mar 26, 2010) (establishing a right to government-appointed counsel for
24 detained immigrants with severe mental disabilities in California, Arizona, and
25 Washington); *F.L.B. (formerly J. E. F.M.) v. Sessions* No. 15-35738 (9th Cir. Sep 17,
26 2015) (seeking to vindicate the right to appointed counsel for children in immigration
27 proceedings); *C.J.L.G. v. Barr*, No. 16-73801 (9th Cir. Dec 1, 2016) (same);
28 *International Refugee Assistance Project v. Kelly*, No. 17-01761 (C.D. Cal. Mar 4,


1 2017) (challenging the detention of an Afghan family following the Trump
2 Administration's Muslim Ban; awarded enhanced fees for distinctive knowledge and
3 specialized skill under the Equal Justice Act); and *Bravo-Castillo v. Barr*, No.
4 20:00605 (C.D. Cal. Mar 25, 2020) (challenging the detention of community members
5 arrested in ICE raid during the COVID-19 public health emergency).

6 5. During the present litigation, I served as co-counsel and assisted in the
7 development and framing of our legal theories of the case. I also visited and met with
8 potential class members at detention facilities, which required considerable
9 specialized knowledge of the methods and procedures utilized by immigration agents
10 to process families seeking asylum. I was also involved in the drafting and editing of
11 our complaint and settlement negotiations, which required specialized knowledge of
12 the nuances of the intersection between immigration law and constitutional law.

13 6. I keep time contemporaneously with my tasks on this matter. The records
14 of my time were entered into Public Counsel's database. In total, I spent 28.05 hours
15 preparing for, drafting, and editing the complaint. I spent 5.45 hours preparing for and
16 participating in settlement negotiations. I spent a total of 33.5 hours on this matter. I
17 do not believe qualified counsel of my level of skill and expertise could have been
18 found to prosecute plaintiffs' claims for less than \$795 per hour.

19 I declare under penalty of perjury under the laws of the United States of
20 America that the foregoing is true and correct.

21 Executed on this 15th day of February 2024, in Los Angeles, California.

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23 Talia Inlender
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